

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SHANNAN ELLIS, RICH FREIBERG,
CHRISTOPHER ROY, and STEPHEN
RIES, individually and on behalf of all
others similarly situated,

Plaintiff,

vs.

HUB INTERNATIONAL LIMITED,

Defendant.

Hon. John J. Tharp Jr.

Master File No. 1:23-CV-06137

**PLAINTIFFS' UNOPPOSED MOTION
FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Settlement, the Declaration of William B. Federman in Support of Plaintiffs' Unopposed Motion for Preliminary Approval, and all prior pleadings and proceedings had herein, Plaintiffs Shannan Ellis, Rich Freiberg, Christopher Roy, and Stephen Ries (collectively, "Plaintiffs") move pursuant to Federal Rule of Civil Procedure 23 for an Order: (1) granting preliminary approval of the proposed class action Settlement; (2) preliminarily certifying a class for purposes of Settlement; (3) appointing Plaintiffs as Settlement Class Representatives; (4) appointing William B. Federman, Tyler J. Bean, and Raina Borrelli as Class Counsel; (5) approving the Parties' proposed form and method of giving notice of the pendency of this action and the Settlement to the Settlement Class; (6) directing that notice be given to the Settlement Class; (7) scheduling a hearing at which time the Court will consider the request for final approval of the Settlement and request for attorneys' fees, expenses,

and service awards to Plaintiffs; and (8) granting such other relief and further relief as the Court deems just and proper.

Defendant Hub International Limited does not oppose the relief requested herein.

Date: April 3, 2025

Respectfully Submitted,

By: William B. Federman
William B. Federman
FEDERMAN & SHERWOOD
10205 N. Pennsylvania Ave.
Oklahoma City, OK 73120
T: (405) 235-1560
E: wbf@federmanlaw.com

Raina Borrelli
STRAUSS BORRELLI, PLLC
980 N. Michigan Avenue, Suite 1610
Chicago, Illinois 60611
T: 872.263.1100
E: raina@straussborrelli.com

Mason A Barney
Tyler J. Bean
SIRI & GLIMSTAD LLP
745 Fifth Ave., Suite 500
New York, NY 10151
T: (212) 532-1091
E: tbean@sirillp.com

Proposed Class Counsel

CERTIFICATE OF SERVICE

I hereby certify that on April 3, 2025, I electronically filed the foregoing document using the Court's electronic filing system, which will notify all counsel of record authorized to receive such filings.

/s/William B. Federman